

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

EPIC GAMES, INC.)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 5:17-CV-534-H
)	
C.R.,)	
)	
Defendant.)	

**PLAINTIFF’S NOTICE PROPOSING APPOINTMENT OF PAMELA S. CHESTEK AS
GUARDIAN AD LITEM FOR DEFENDANT C.R.**

Pursuant to the Court’s August 12, 2020 Order granting Plaintiff’s Motion to Appoint Guardian ad Litem (D.E. 35) and directing Plaintiff “to file [by September 2, 2020], a notice proposing an individual to act as guardian ad litem and information regarding the suitability of that person to act as guardian ad litem,” *id.*, Plaintiff Epic Games, Inc. (“Epic” or “Plaintiff”) shows the Court as follows:

1. After a diligent search, Epic’s undersigned attorney has identified Pamela S. Chestek (“Ms. Chestek”) as an individual he believes is well-qualified and suitable to act as guardian ad litem for Defendant C.R. (“Defendant” or “C.R.”) in this proceeding.

2. Epic’s attorney has provided Ms. Chestek with information related to this case, including the most relevant unsealed pleadings, and, following her review of those materials and conducting her own investigation, she has expressed willingness to be nominated to act as guardian ad litem for C.R. in this proceeding.

3. Ms. Chestek is currently the principal attorney at Chestek Legal, located in Raleigh. She has over 20 years of experience as both in-house and outside counsel. She has served as in-house intellectual property counsel to companies such as Red Hat, Reebok, and

Progress Software. Ms. Chestek's diverse and sophisticated intellectual property practice has provided her with extensive experience in all aspects of intellectual property law, including copyright law.

4. Ms. Chestek has previously served as a guardian ad litem to a minor defendant in a similar case in the Eastern District of North Carolina, namely, *Epic Games, Inc. et al v. B.B.*, Case Number 5:17-cv-00511-FL, which was resolved pursuant to a settlement agreement approved by the Court.

5. Ms. Chestek is admitted to practice in the States of Connecticut, Massachusetts, New York, North Carolina, and the District of Columbia. A true and correct copy of Ms. Chestek's *curriculum vitae* is attached hereto as Exhibit A.

6. After consulting with Ms. Chestek about this nomination, the undersigned is confident that Ms. Chestek will act for Defendant and protect his best interests in this matter.

7. Ms. Chestek has confirmed that she has no conflicts acting on behalf of Defendant.

8. In light of the foregoing, Epic respectfully submits this Notice proposing appointment of Pamela S. Chestek as guardian ad litem to represent C.R. in this action.

This the 1st day of September, 2020.

/s/ Christopher M. Thomas
Christopher M. Thomas
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*Attorneys for Plaintiff
Epic Games, Inc.*

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **PLAINTIFF'S NOTICE PROPOSING APPOINTMENT OF PAMELA S. CHESTEK AS GUARDIAN AD LITEM FOR DEFENDANT C.R.** was electronically filed this day with the Clerk of Court using the CM/ECF system and served via U.S. Mail, first class postage prepaid, addressed to the following:

C.R.
c/o Lauren Rogers
5 Vireo Circle
Newark, DE 19711

Lauren Rogers
5 Vireo Circle
Newark, DE 19711

C.R.
c/o Lauren Rogers
501 West Ave.
New Castle, DE 19720

Lauren Rogers
501 West Ave.
New Castle, DE 19720

This the 1st day of September, 2020.

/s/ Christopher M. Thomas
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